

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re	:	Chapter 11
	:	
TERRAFORM LABS PTE. LTD., <i>et al.</i> ,	:	Case No. 24-10070 (BLS)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
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NOTICE OF *AMENDED*² AGENDA OF MATTERS SCHEDULED
FOR HEARING ON SEPTEMBER 19, 2024 AT 10:00 A.M. (ET), BEFORE THE
HONORABLE BRENDAN L. SHANNON, AT THE UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF DELAWARE, 6TH FLOOR, COURTROOM 1³

THE HEARING WILL BE HELD IN-PERSON IN JUDGE SHANNON'S
COURTROOM.

ALL PARTIES, INCLUDING WITNESSES, WISHING TO PARTICIPATE IN THE
HEARING MUST ATTEND IN PERSON.

COURTCALL WILL NOT BE USED TO DIAL IN. TO ATTEND A HEARING
REMOTELY, PLEASE REGISTER USING THE ECOURT APPEARANCES TOOL ON
THE COURT'S WEBSITE AT WWW.DEB.USCOURTS.GOV OR CLICK THE
FOLLOWING LINK: <https://ecf.deb.uscourts.gov/cgi-bin/nysbAppearances.pl>.

AFTER REGISTERING YOUR APPEARANCE, YOU WILL RECEIVE A
CONFIRMATION EMAIL CONTAINING INFORMATION ABOUT JOINING THE
HEARING REMOTELY.

IF ATTENDING THIS HEARING REMOTELY, PARTIES ARE REQUIRED TO
REGISTER FOR THE HEARING BY 4:00 P.M. (ET) ONE BUSINESS DAY PRIOR TO
THE HEARING. YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO
ZOOM OR YOU WILL NOT BE ALLOWED INTO THE MEETING.

¹ The Debtors in these chapter 11 cases are: Terraform Labs Pte. Ltd. and Terraform Labs Limited. The Debtors' principal offices are located at 10 Anson Road, #10-10 International Plaza, Singapore 079903.

² Amended items appear in bold.

³ All motions and other pleadings referenced herein are available online at the following address:
<https://dm.epiq11.com/case/terraform>.

I. RESOLVED MATTER:

1. Application of Debtors for Entry of an Order (I) Authorizing the Retention and Employment of PGP Capital Advisors, LLC as Investment Banker to the Debtors Effective as of July 30, 2024, (II) Waiving Certain Information Requirements Pursuant to Local Rule 2016-2, and (III) Granting Related Relief [[Docket No. 639](#) – filed August 27, 2024]

Objection / Response Deadline: September 10, 2024 at 4:00 p.m. (ET)

Objections / Responses Received: None

Related Documents:

- i. Certificate of No Objection Regarding Application of Debtors for Entry of an Order (I) Authorizing the Retention and Employment of PGP Capital Advisors, LLC as Investment Banker to the Debtors Effective as of July 30, 2024, (II) Waiving Certain Information Requirements Pursuant to Local Rule 2016-2, and (III) Granting Related Relief [[Docket No. 682](#) – filed September 12, 2024]
- ii. Order (I) Authorizing the Retention and Employment of PGP Capital Advisors, LLC as Investment Banker to the Debtors Effective as of July 30, 2024, (II) Waiving Certain Information Requirements Pursuant to Local Rule 2016-2, and (III) Granting Related Relief [[Docket No. 692](#) – entered September 16, 2024]

Status: On September 16, 2024, the Court entered an order regarding this matter. Accordingly, a hearing on this matter is no longer necessary.

II. CONTINUED MATTERS:

2. Motion of Debtor for Entry of Interim and Final Orders (I) Authorizing Debtor to Use Treasury Management System, (II) Authorizing Continuation of Intracompany and Intercompany Transactions, (III) Extending Time to Comply with Requirements of 11 U.S.C. § 345(b), and (IV) Granting Related Relief [[Docket No. 21](#) – filed January 30, 2024]

Objection / Response Deadline: February 26, 2024 at 4:00 p.m. (ET); extended for the Office of the United States Trustee (the “U.S. Trustee”), the Official Committee of Unsecured Creditors (the “Creditors’ Committee”), and the U.S. Securities and Exchange Commission (the “SEC”)

Objections / Responses Received:

- A. Informal comments from the U.S. Trustee, the Creditors’ Committee, and the SEC

Related Documents:

- i. Interim Order (I) Authorizing Debtor to Use Treasury Management System, (II) Authorizing Continuation of Intracompany and Intercompany Transactions,

(III) Extending Time to Comply with Requirements of 11 U.S.C. § 345(b), and (IV) Granting Related Relief [[Docket No. 40](#) – entered February 2, 2024]

- ii. Notice of (A) Entry of Interim Order (I) Authorizing Debtor to Use Treasury Management System, (II) Authorizing Continuation of Intracompany and Intercompany Transactions, (III) Extending Time to Comply with Requirements of 11 U.S.C. § 345(b), and (IV) Granting Related Relief; and (B) Final Hearing Thereon [[Docket No. 41](#) – filed February 2, 2024]
- iii. Second Interim Order (I) Authorizing Debtor to Use Treasury Management System, (II) Authorizing Continuation of Intercompany and Intracompany Transactions, and (III) Granting Related Relief [[Docket No. 211](#) – entered April 8, 2024]

Status: The hearing on this matter has been continued to the omnibus hearing scheduled for October 2, 2024 at 11:00 a.m. (ET).

- 3. Motion of Debtor for Entry of an Order (I) Authorizing the Debtor to File Under Seal Confidential Information in the Exhibits to Dentons US LLP's First Monthly Fee Application and (II) Establishing Procedures for the Debtor to File Under Seal Confidential Information in Prospective Dentons Fee Applications [[Docket No. 246](#) – filed April 22, 2024]

Objection / Response Deadline: May 6, 2024 at 4:00 p.m. (ET); extended for the U.S. Trustee

Objections / Responses Received:

A. Informal comments from the U.S. Trustee

Related Documents:

- i. (SEALED) First Monthly Fee Application of Dentons US LLP as Special Counsel for the Debtor and Debtor in Possession for Allowance of Compensation and Reimbursement of Expenses for the Period from January 21, 2024 through February 29, 2024 [[Docket No. 232](#) – filed April 17, 2024]
- ii. (REDACTED) First Monthly Fee Application of Dentons US LLP as Special Counsel for the Debtor and Debtor in Possession for Allowance of Compensation and Reimbursement of Expenses for the Period from January 21, 2024 through February 29, 2024 [[Docket No. 233](#) – filed April 17, 2024]
- iii. (SEALED) Second Monthly Fee Application of Dentons US LLP as Special Counsel for the Debtor and Debtor in Possession for Allowance of Compensation and Reimbursement of Expenses for the Period from March 1, 2024 through March 31, 2024 [[Docket No. 284](#) – filed May 3, 2024]
- iv. (REDACTED) Second Monthly Fee Application of Dentons US LLP as Special Counsel for the Debtor and Debtor in Possession for Allowance of Compensation and

Reimbursement of Expenses for the Period from March 1, 2024 through March 31, 2024 [[Docket No. 285](#) – May 3, 2024]

- v. (SEALED) Third Monthly Fee Application of Dentons US LLP as Special Counsel for the Debtor and Debtor in Possession for Allowance of Compensation and Reimbursement of Expenses for the Period from April 1, 2024 through April 30, 2024 [Docket No. 440 – filed July 9, 2024]
- vi. (REDACTED) Third Monthly Fee Application of Dentons US LLP as Special Counsel for the Debtor and Debtor in Possession for Allowance of Compensation and Reimbursement of Expenses for the Period from April 1, 2024 through April 30, 2024 [[Docket No. 441](#) – filed July 9, 2024]
- vii. (SEALED) Fourth Monthly Fee Application of Dentons US LLP as Special Counsel for the Debtor and Debtor in Possession for Allowance of Compensation and Reimbursement of Expenses for the Period from May 1, 2024 through May 31, 2024 [Docket No. 507 – filed July 26, 2024]
- viii. (REDACTED) Fourth Monthly Fee Application of Dentons US LLP as Special Counsel for the Debtor and Debtor in Possession for Allowance of Compensation and Reimbursement of Expenses for the Period from May 1, 2024 through May 31, 2024 [[Docket No. 508](#) – filed July 26, 2024]
- ix. (SEALED) Fifth Monthly Fee Application of Dentons US LLP as Special Counsel for the Debtor and Debtor in Possession for Allowance of Compensation and Reimbursement of Expenses for the Period from June 1, 2024 through June 30, 2024 [Docket No. 578 – filed August 9, 2024]
- x. (REDACTED) Fifth Monthly Fee Application of Dentons US LLP as Special Counsel for the Debtor and Debtor in Possession for Allowance of Compensation and Reimbursement of Expenses for the Period from June 1, 2024 through June 30, 2024 [[Docket No. 579](#) – filed August 9, 2024]

Status: The parties are working to resolve this matter consensually. To the extent a hearing is necessary, the hearing on this matter has been continued to the omnibus hearing scheduled for October 2, 2024 at 11:00 a.m. (ET).

4. Application of Debtors for Entry of an Order (I) Authorizing the Retention and Employment of Cavu Securities, LLC as Investment Banker to the Debtors Effective as of June 5, 2024, (II) Waiving Certain Information Requirements Pursuant to Local Rule 2016-2, and (III) Granting Related Relief [[Docket No. 609](#) – filed August 16, 2024]

Objection / Response Deadline: August 30, 2024 at 4:00 p.m. (ET); extended for the U.S. Trustee

Objections / Responses Received:

A. Informal comments from the U.S. Trustee

Related Documents: None.

Status: The hearing on this matter has been continued to the omnibus hearing scheduled for October 2, 2024 at 11:00 a.m. (ET).

III. CONFIRMATION:

5. Second Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited [[Docket No. 700](#) – filed September 17, 2024]

Objection / Response Deadline: September 12, 2024 at 4:00 p.m. (ET); extended to September 13, 2024 at 4:00 p.m. (ET) for the U.S. Trustee; extended for SEC and related Litigation Party to September 17, 2024 at 10:00 a.m. (ET); extended for Avalanche (BVI), Inc. to September 17, 2024 at 5:00 p.m. (ET)

Objections / Responses Received:

- A. Objection to Confirmation of the Proposed Plan (filed by Thomas Pierre Blanc) [[Docket No. 671](#) – filed September 9, 2024]
- (i) Amended Objection to Confirmation of the Proposed Plan Regarding Prioritization of UST and Non-Institutional Investors for Compensation (filed by Thomas Pierre Blanc) [[Docket No. 679](#) – filed September 12, 2024]
 - (ii) Objection to Confirmation of the Proposed Plan Regarding Prioritization of UST and Non-Institutional Investors for Compensation (filed by Thomas Pierre Blanc) [[Docket No. 685](#) – filed September 13, 2024]
 - (iii) Motion for Leave to File Objection Out of Time (filed by Thomas Pierre Blanc) [[Docket No. 687](#) – filed September 13, 2024]

Status: The hearing on these objections is going forward.

- B. Objection to Proposed Recovery Plan (filed by Xavier Mattern) [[Docket No. 675](#) – filed September 11, 2024]

(i) Motion for Leave to File Objection Out of Time (filed by Xavier Mattern) [[Docket No. 688](#) – filed September 13, 2024]

Status: The hearing on this objection is going forward.

- C. Objection to Amended Chapter 11 Plan of Terraform Labs Pte. Ltd., *et al.* (filed by Anna Spigiel) [[Docket No. 676](#) – filed September 11, 2024]

Status: The hearing on this objection is going forward.

- D. Objection to the Debtor's Proposed Recovery Plan (filed by Maxim S. Kalmykov) [[Docket No. 678](#) – filed September 12, 2024]

(i) Motion for Leave to File Objection Out of Time (filed by Maxim S. Kalmykov) [[Docket No. 686](#) – filed September 13, 2024]

Status: The hearing on this objection is going forward.

- E. United States Trustee's Objection to Confirmation of Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited [[Docket No. 681](#) – filed September 12, 2024]

Status: The hearing on this objection is going forward.

- F. Objection to Motion of Debtor to Confirmation of Proposed Plan and for Entry of Order Approving Stipulation Between Debtor and Singapore Action Claimants Regarding Relief from the Automatic Stay (filed by Raminder Hora) [[Docket No. 689](#) – filed September 14, 2024]

Status: The hearing on this objection is going forward.

- G. Objection to the Confirmation of the Proposed Liquidation Plan (filed by Rex Wu) [[Docket No. 695](#) – filed September 16, 2024]

(i) **Notice of Errata** [[Docket No. 709](#) – filed September 17, 2024]

(ii) **Response to Debtors' Memorandum of Law in Support of Confirmation of Second Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited** [[Docket No. 710](#) – filed September 17, 2024]

Status: The hearing on this objection is going forward.

- H. Informal Comments from the United States Department of Justice

Status: The informal comments have been resolved through changes to the Plan and proposed confirmation order.

I. Informal Comments from the SEC

Status: The informal comments have been resolved through changes to the Plan and proposed confirmation order.

J. Informal Comments from the Creditors' Committee

Status: The informal comments have been resolved through changes to the Plan and proposed confirmation order.

K. Informal Comments from Avalanche (BVI), Inc.

Status: The Debtors are working to resolve the informal comments through changes to the Plan and proposed confirmation order.

L. **Reservation of Rights of Avalanche (BVI), Inc. to Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited [[Docket No. 714](#) – filed September 18, 2024]**

Status: The Debtors are working to resolve the reservation of rights through changes to the Plan and proposed confirmation order.

Cure Objection / Response Deadline: September 12, 2024 at 4:00 p.m. (ET)

Supplemental Cure Objection / Response Deadline: September 26, 2024 at 4:00 p.m. (ET)

Cure Objections / Responses Received: None at this time.

Related Documents:

- i. Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited [[Docket No. 568](#) – filed August 8, 2024]
- ii. Disclosure Statement for Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited [[Docket No. 569](#) – filed August 8, 2024]
- iii. Notice of Blacklines of Solicitation Versions of (I) Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited and (II) Disclosure Statement for Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited [[Docket No. 571](#) – filed August 8, 2024]
- iv. Order (I) Approving Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Establishing Cure Procedures (IV) Scheduling Confirmation Hearing, (V) Establishing Notice and Objection Procedures for Confirmation of Proposed Plan, and (VI) Granting Related Relief [[Docket No. 572](#) – entered August 8, 2024]

- v. Notice of (I) Approval of Disclosure Statement, (II) Establishment of Voting Record Date, (III) Hearing on Confirmation of the Proposed Plan, (IV) Procedures for Objection to Confirmation of the Proposed Plan, and (V) Procedures and Deadline for Voting on the Proposed Plan [[Docket No. 584](#) – filed August 12, 2024]
- vi. Debtors’ First Omnibus Objection (Substantive) for Reclassification of Certain Disputed Claims as Crypto Loss Claims Solely for Voting Purposes [[Docket No. 619](#) – filed August 20, 2024]
- vii. Debtors’ Second Omnibus Objection (Substantive) for Temporary Reduction or Disallowance of Certain Disputed Claims Solely for Voting Purposes [[Docket No. 620](#) – filed August 20, 2024]
- viii. Order Approving Stipulation by and Between the Debtors and the Foreign Representatives of Three Arrows Capital, Ltd. Regarding Treatment of Claim Solely for Voting Purposes [[Docket No. 621](#) – entered August 21, 2024]
- ix. Notice of Filing of Plan Supplement in Connection With Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited [[Docket No. 653](#) – filed August 29, 2024]
- x. Notice of Potential Assumption and Assignment and Cure Amounts in Connection With Contracts and Leases [[Docket No. 654](#) – filed August 29, 2024]
- xi. Notice of Filing of Second Plan Supplement in Connection With Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited [[Docket No. 664](#) – filed September 5, 2024]
- xii. Proof of Publication [[Docket No. 674](#) – filed September 10, 2024]
- xiii. Supplemental Notice of Potential Assumption and Assignment and Cure Amounts in Connection with Contracts and Lease [[Docket No. 683](#) – filed September 12, 2024]
- xiv. Notice of Filing of Third Plan Supplement in Connection with Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited [[Docket No. 684](#) – filed September 12, 2024]
- xv. Proof of Publication [[Docket No. 693](#) – filed September 16, 2024]
- xvi. Declaration of Emily Young, on Behalf of Epiq Corporate Restructuring, LLC Regarding Solicitation and Tabulation of Ballots Cast on the Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. and Terraform Labs Limited [[Docket No. 699](#) – filed September 17, 2024]
- xvii. Notice of Blackline of Second Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited [[Docket No. 701](#) – filed September 17, 2024]

- xviii. Notice of Filing of Proposed Confirmation Order [[Docket No. 702](#) – filed September 17, 2024]
- xix. Debtors’ Memorandum of Law in Support of Confirmation of Second Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited [[Docket No. 703](#) – filed September 17, 2024]
 - (a) Motion of Debtors for Entry of an Order Authorizing the Debtors to Exceed the Page Limit Requirement with Respect to the Debtors’ Confirmation Brief [[Docket No. 704](#) – filed September 17, 2024]
 - (b) Order Authorizing the Debtors to Exceed the Page Limit Requirement with Respect to the Debtors’ Confirmation Brief [[Docket No. 705](#) – entered September 17, 2024]
- xx. Declaration of Michael Leto in Support of Confirmation of Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. and Terraform Labs Limited [[Docket No. 706](#) – filed September 17, 2024]
- xxi. **Statement of the Official Committee of Unsecured Creditors in Support of Confirmation of the Amended Chapter 11 Plan of Terraform Labs Pte. Ltd. and Its Affiliated Debtor** [[Docket No. 713](#) – filed September 18, 2024]
- xxii. **Second Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited** [[Docket No. 717](#) – filed September 18, 2024]
- xxiii. **Notice of Blackline of Revised Second Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited** [[Docket No. 718](#) – filed September 18, 2024]
- xxiv. **Notice of Filing of Fourth Plan Supplement in Connection with Second Amended Chapter 11 Plan of Liquidation of Terraform Labs Pte. Ltd. and Terraform Labs Limited** [[Docket No. 719](#) – filed September 18, 2024]

Status: The hearing on this matter is going forward.

Dated: September 18, 2024
Wilmington, Delaware

/s/ Matthew P. Milana

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